

Compliance Assessment Report CAR_NRW0048021

Permit being assessed: CB3593HF.

For: Parry and Evans Ltd, **held by:** Parry And Evans Limited

At: Unit 103, Zone 1, Deeside Industrial Park, Flintshire, CH5 2LR.

Type of assessment: Site Inspection,

Reason: Routine.

On: 28/03/2025 between 13:30 and 14:30.

Parts of permit assessed: Table S1.1, 3.1.1.

NRW Lead Officer: Amy Henderson, accompanied by Steven White.

Report sent to: Lee Evans, Steve Evans, Company Directors, on 14/04/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2C - Waste - Operations - Operating techniques	C3 Minor	Table S1.1
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Ongoing (O)	3.1.1

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
W2C	Ensure all storage on site is compliant with Table S1.1 of the permit.	11/07/2025
W3B	Ensure measures are in place to minimise litter offsite - i.e suitable storage, litter picks (Score has been consolidated under W2C)	11/07/2025

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was a routine unannounced inspection carried out by Waste Regulation Officer Amy Henderson and Senior Waste Regulation Officer Steven White.

The weather on the day of the inspection was dry but windy.

On arrival at site Officers were met by Steve Walker (Site TCM) who accompanied us throughout the visit. The site was operational at the time of the inspection with wagons arriving to deposit waste and waste being sorted.

Waste quantities within the area at the front of the site were high, this was discussed and it was explained to Officers that because it was at the end of the week the quantities were at their highest and were due to be removed from site over the coming days. The importance of ensuring quantities were within those stated on the sites FPMP to minimise fire risk was discussed.

Quantities within the picking line area of the site were seen to be spilling out of the building.



Photograph of waste outside of the covered area in the picking line area of the site.

The area of the site currently operating under exemptions was not operational at the time due to repairs being needed to the machinery. It was confirmed by the site that this is currently still being operated separately to the permitted activities with an annual waste transfer note in place between the two. You are reminded of the upcoming changes to waste exemptions, which will mean permitted sites will no longer be able to register exemptions alongside the permitted activities. We would encourage you to be pro-active in applying for a variation to bring this activity under the permit conditions.

The ditch to the rear of the site was inspected. There has been little rainfall over the last few weeks and no discharges from site were taking place at the time of the inspection. There was an improvement seen since Officers last carried out an inspection but the water in the ditch was still seen to be discoloured. There was no flow to the ditch at the time, with the downstream area having dried up before the outfall of this ditch. It was discussed the role of the interceptors and that these are for treatment of water contaminated with oil and some suspended solids. Water requiring further treatment should not be discharged through the interceptor. The site is encouraged to monitor these outfalls regularly for any signs of pollution.

The permit condition relating to only baled/inert waste being stored outside was discussed. The site appears to have made some progress in ensuring any loose waste is under cover, following an action given on the sites previous CAR form. A bay containing plastics from household collections was discussed as this was still not under cover. Along with risks relating to the site drainage/discharges from site this was also identified to be causing issues with litter blowing around and offsite. Steve Walker confirmed via email after the inspection that a cover has now been ordered for this area and tipping will take place under cover in the meantime. It was also confirmed that a litter pick had taken place and photographs provided to evidence this. There was also waste stored not undercover in the yard area at the front of the site.



Photographs of waste being stored outside - although on an impermeable surface, drainage from these areas flows to the interceptor to surface water.



Photograph of litter which had accumulated near the rear entrance to the site.

Please ensure all waste is stored in compliance with table S1.1 activities, of the permit, which is discussed in further detail below.

An action was given in the last CAR form to ensure the site was secure. Gates have now been reinstalled to the rear yard, where unauthorised access had previously been possible. The site is reminded to ensure these gates are shut/locked when not in use.

As a result of the site inspection the following breaches have been identified;

Section A2 of the table S1.1 Activities states; *All non-Hazardous waste must be stored within a building or in a container or covered area, on an impermeable surface with sealed drainage. Also page 5 in relation to discharge states Drainage consisting solely of: - Rainfall dependent runoff from the external yard areas of the site (excluding the vehicle wash bay area) that are used in connection with the storage of waste consisting of baled recyclable materials from the Materials Recycling Facility (A1) and inert wastes (as identified in 3.5.10 of the Environmental Management System (Ref.1537-DEE-MAP-A)) only, discharged via an interceptor to surface water drains. - Clean surface water from roofs, or from areas of the site that are not being used in connection with storing and treating waste, may be discharged via an interceptor to surface waters. All other drainage from external yard areas must be discharged to foul sewer subject to a consent issued by the relevant sewage undertaker. No visible oil, grease or suspended solids shall be present in the discharge to surface water drains. There shall be no discharge from the buildings on site used to store and/or treat waste.*

During the inspection it was identified that some improvements have been made with regard to the above since the last site inspection. There are still some areas where waste is not being stored under cover, in compliance with the above permit conditions. This has the potential to cause pollution from the discharge point at the rear of the site. It was also identified as a cause of litter blowing off the site. The litter has also been scored under this compliance criteria as the route cause was deemed to be storage on site.

As a result of this breach a Category 3 non-compliance score has been issued on this occasion, taking into consideration the following factors;

- Some improvements have been made with regard to storage on the site following advice given on the last CAR form issued.
- Due to the weather conditions over recent weeks, no discharge was witnessed from

the site interceptors during the inspection.

- Further improvement measures were confirmed to have been put in place soon after the advice given during the site inspection, including tipping of the plastics to now take place indoors and the ordering of a shelter for the bay. Confirmation was also received that a litter pick had taken place.

An action has been given to continue improvement works to bring the storage into compliance with the conditions of table S1.1. The site is reminded they sit within the River Dee Catchment area and the importance of ensuring any discharge from site is in compliance with the permit to prevent any risk of harm to this designated area.

Thank you for your time during the inspection.

Should you have any queries regarding this CAR form please contact

amy.henderson@cyfoethnaturiolcymru.gov.uk

Kind regards

Amy Henderson

Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer

Cyfoeth Naturiol Cymru / Natural Resources Wales

Swyddfa Bwcle / Buckley Office

"In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012"

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.